U S WEST, Inc.
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1020 Nineteenth Street, NW
Washington, DC 20036
202 429-3134
FAX 202 296-5157

Elridge A. Stafford
Executive Director-
Federal Regulatory

EX PARTE OR LATE FILED

U S WEST

June 15, 1995

ORIGINAL

RECEIVED

JUN 15 1995

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Stop Code 1170
Washington, D.C. 20554

RE: CC Docket No. 95-20, CI-III Further Remand

Dear Mr. Caton:

Please be advised that representatives of U S WEST met today with Kevin Werbach, Peggy Reitzel, and Rose Crellin of the Common Carrier Bureau to discuss U S WEST's ONA Compliance procedures. The U S WEST representatives were Sandra Sanchez, Senior Compliance Director - U S WEST Communications, Sara Van Horne, Manager - U S West Communications, Ivy Stevens, Manager - U S WEST Communications, Robert McKenna, Corporate Counsel - U S WEST and Elridge Stafford, Executive Director - U S WEST.

Attached are copies of documents and transcripts of videos that were used at this meeting. In accordance with Section 1.1206(a)(a) of the Commission's rules the original and one copy of this letter, with attachments, are being filed with your office. Please associate this letter and the attachments with the above mentioned proceeding.

Acknowledgement and date of receipt of this information are requested. A duplicate of this letter is included for this purpose. Please contact me should you have any questions concerning this matter.

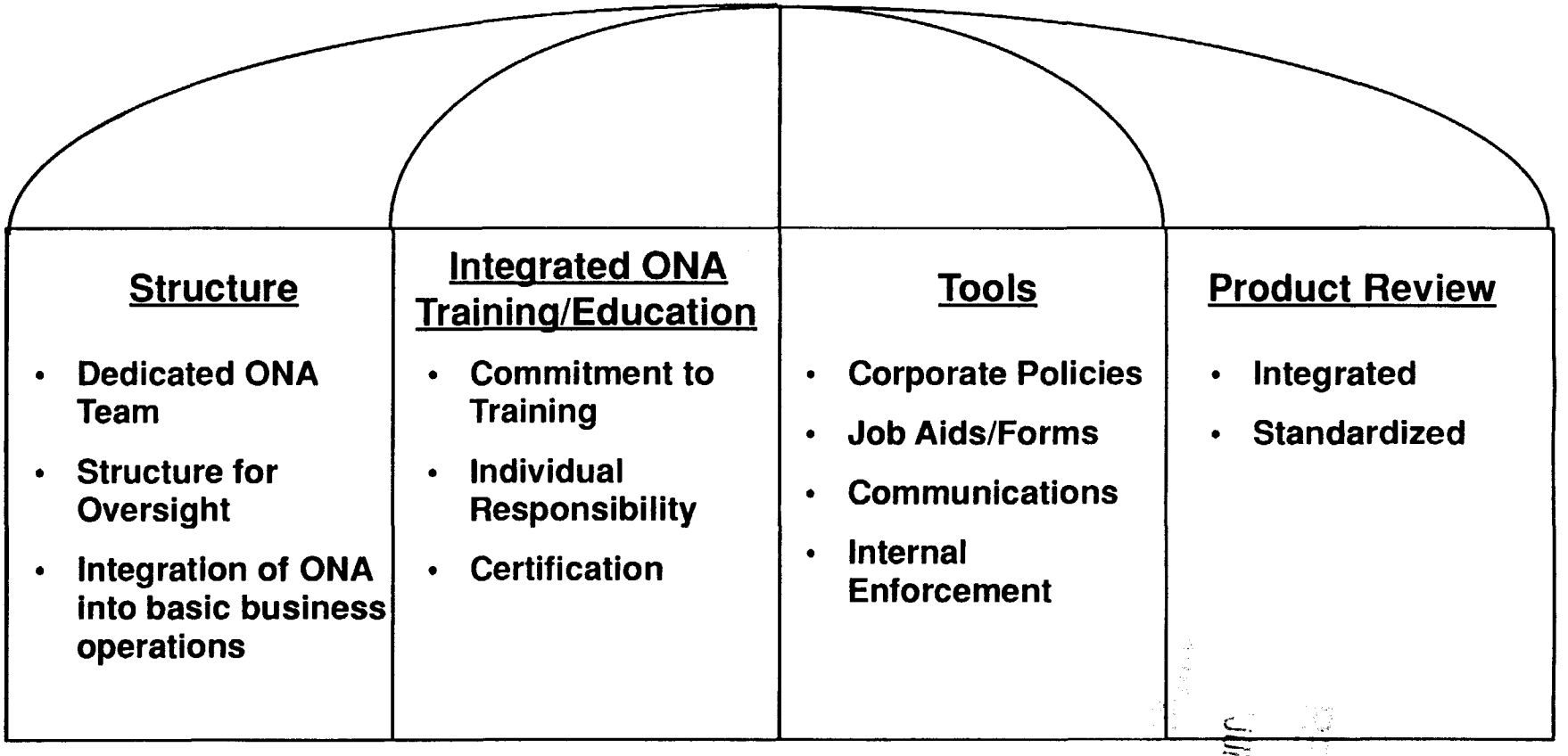
Sincerely,

Elridge Stafford

Attachments
cc: w/o attachments
Kevin Werbach
Peggy Reitzel
Rose Crellin

No. of Copies rec'd 0+1
List ABCDE

ONA Compliance at U S WEST



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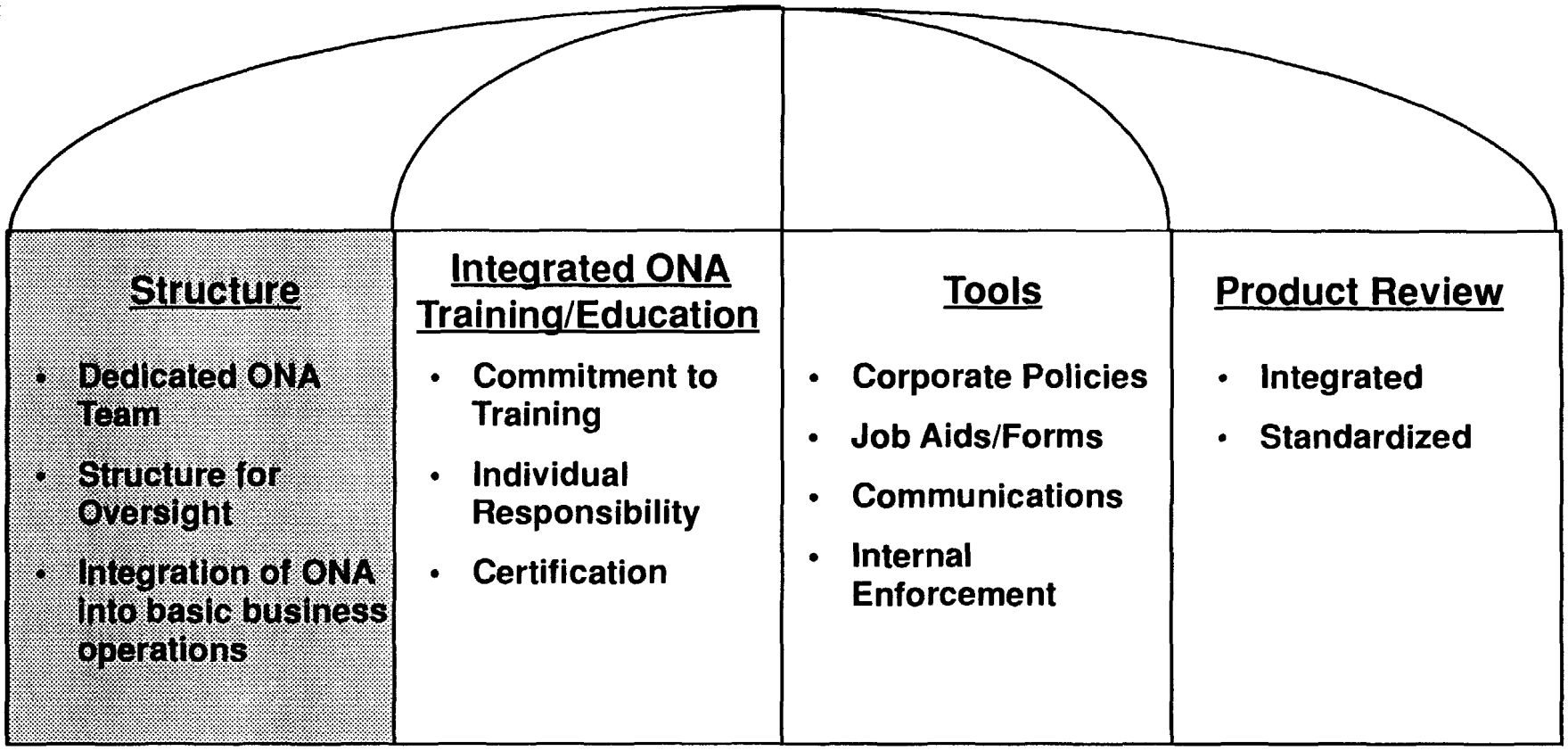

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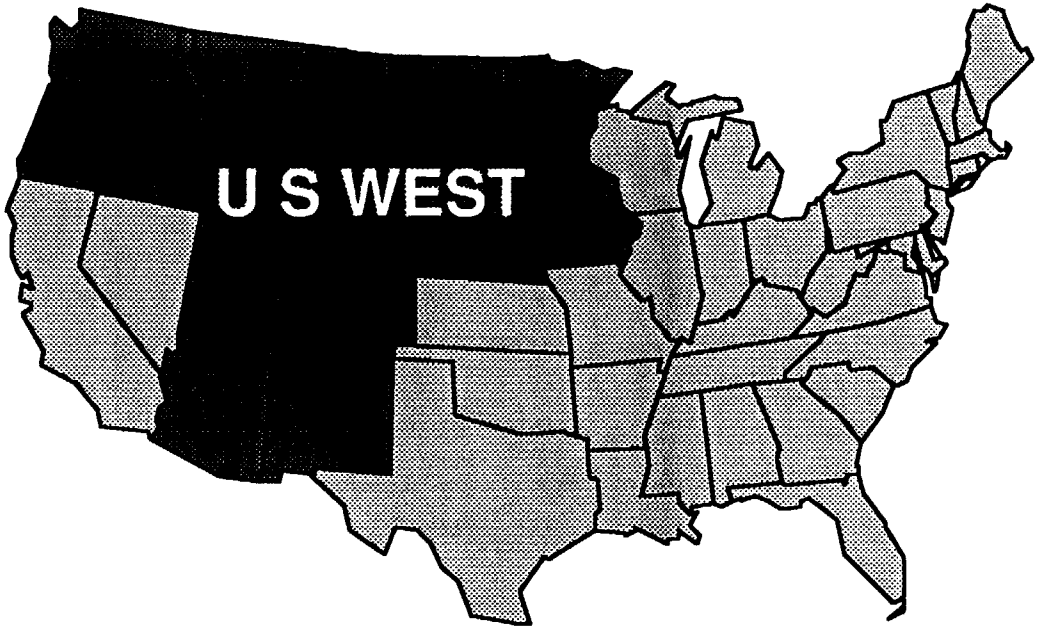


U S WEST Communications provides a full range of connection services to more than 25 million customers in 14 western and midwestern states.

Personal Responsibility

Dick McCormick
Chairman &CEO
U S WEST, Inc.

"...the responsibility for understanding and complying with the FCC principles rests on U S WEST as a Company"
- *ONA & the Information Super Highway*, 1994

Gary Ames
President &CEO
US WEST Communications

"As with the MFJ/CECO/EO training, U S WEST takes ONA, CPE and enhanced service compliance seriously. It is a part of the way U S WEST does business."
- *ONA*CPE*Enhanced Services Compliance*, 1991

Jack MacAllister
Former Chairman &CEO
U S WEST, Inc.

"ONA is a condition of employment"
- Speeches before employee groups, 1988-89

Sandra Sanchez
Senior Compliance
Director ONA

"I am personally responsible for ONA Compliance. Salary reviews, etc. of my entire team depend on the overall U S WEST compliance with the ONA rules."

U S WEST Structure

U S WEST, Inc.

International Business Development Group

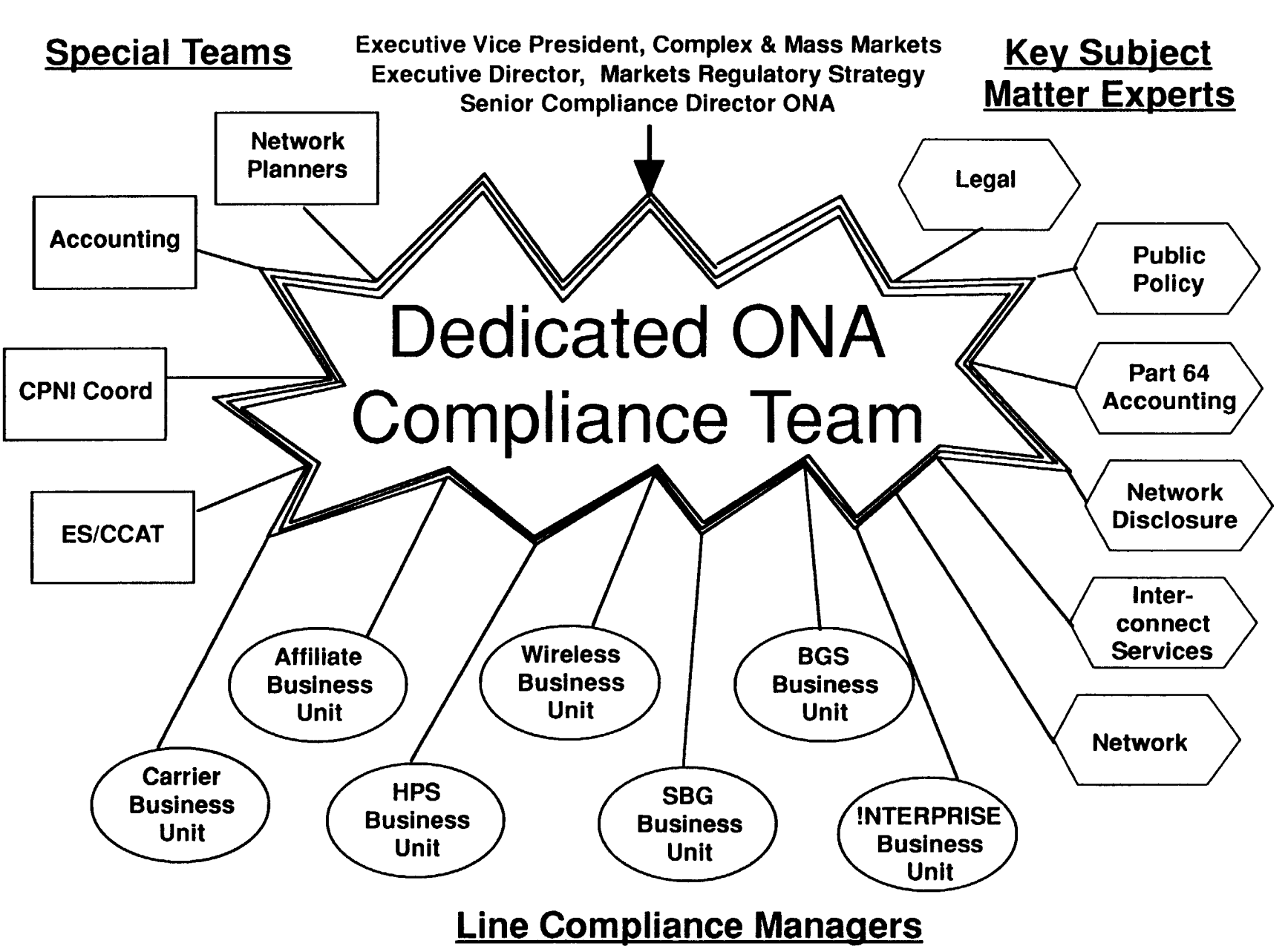
Inc. Group
- D.C. office
- Treasury/Controllers/ Internal Audit
- MIS
- Legal
- Public Relations

Multi Media Vision

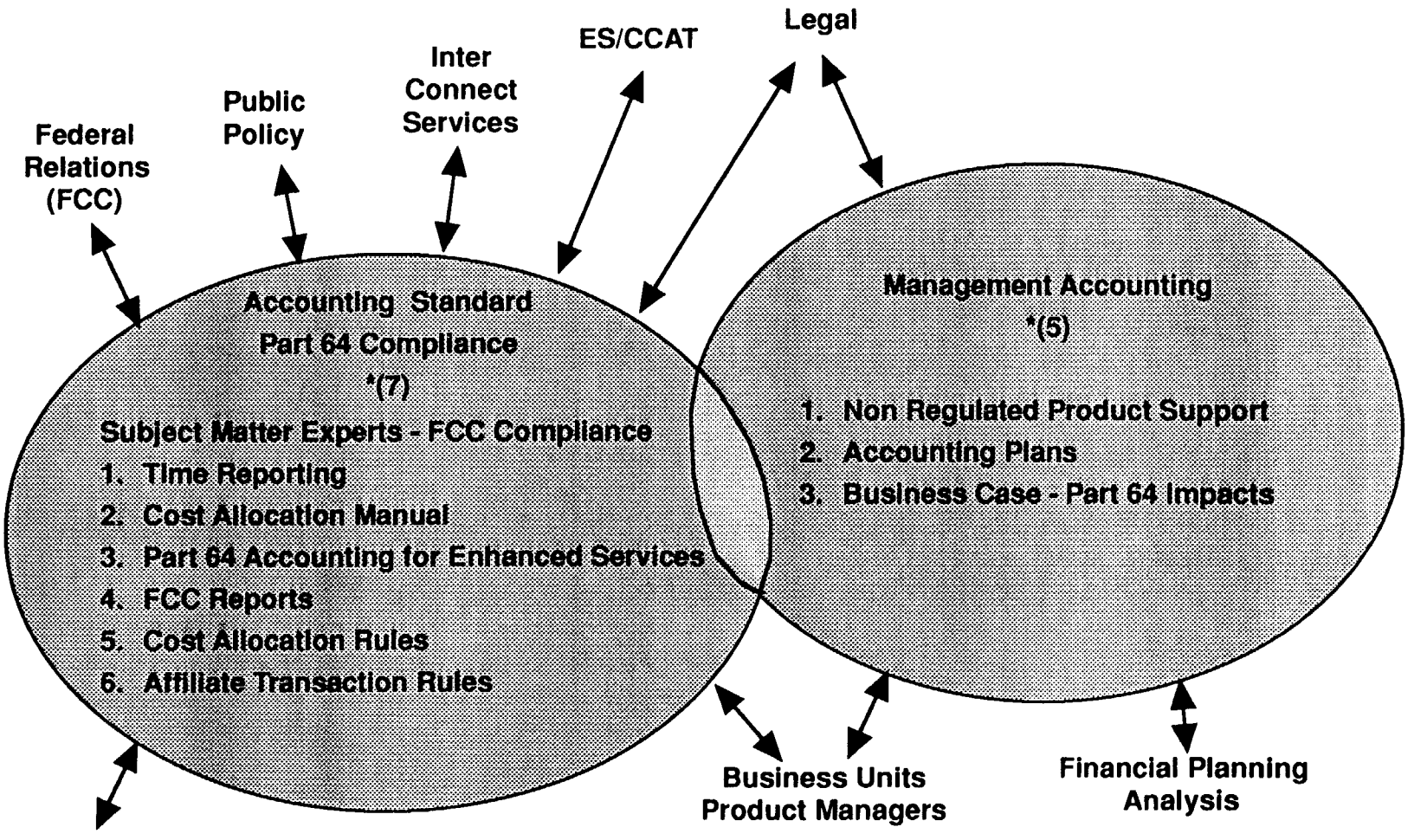
Diversified Group
- New Vector Communications Group
- MRG
  - U S WEST Direct
  - MultiMedia

U S WEST Communications

- Carrier Marketing (IEC & EC)
- Mass Markets
  - Home & Personal Services
  - Small Business Group
- Complex Markets
  - Business & Govt. Services
  - !NTERPRISE
- Finance
- Human Resources
- Advanced Technologies
- Operations & Technology
- Operator Services
- Network
  - Line
  - Provisioning
  - Service Assurance
- Public Policy
- Business Resources (material resources)
- Public Policy
- Interconnection Services Center

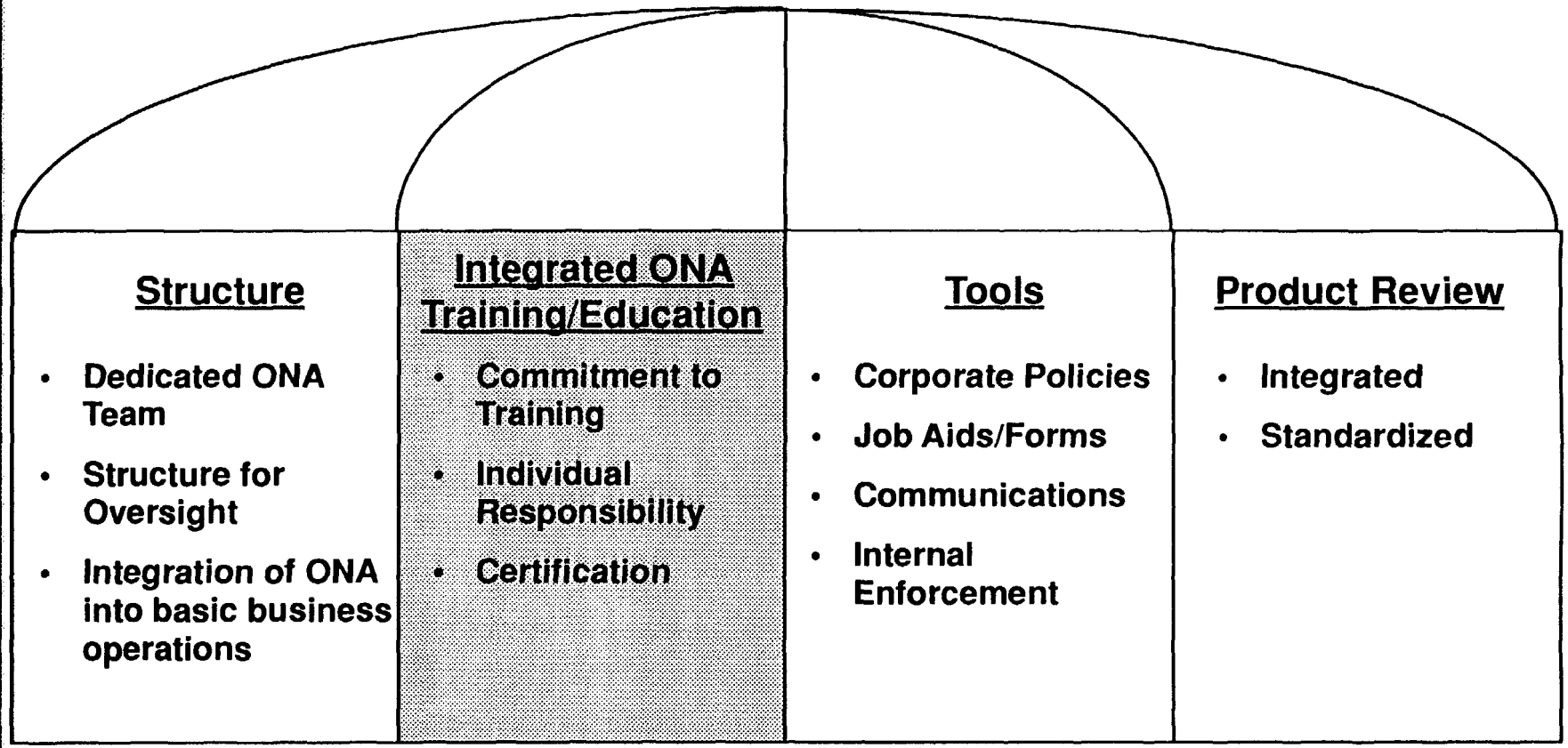

Special Teams
Executive Vice President, Complex & Mass Markets
Executive Director, Markets Regulatory Strategy
Senior Compliance Director ONA
Key Subject Matter Experts
Network Planners
Accounting
CPNI Coord
ES/CCAT
Legal
Public Policy
Part 64 Accounting
Network Disclosure
Inter-connect Services
Network
Dedicated ONA Compliance Team
Affiliate Business Unit
Wireless Business Unit
BGS Business Unit
Carrier Business Unit
HPS Business Unit
SBG Business Unit
!NTERPRISE Business Unit
Line Compliance Managers

Partnerships



*Number of Manager (does not include clerical support staff)

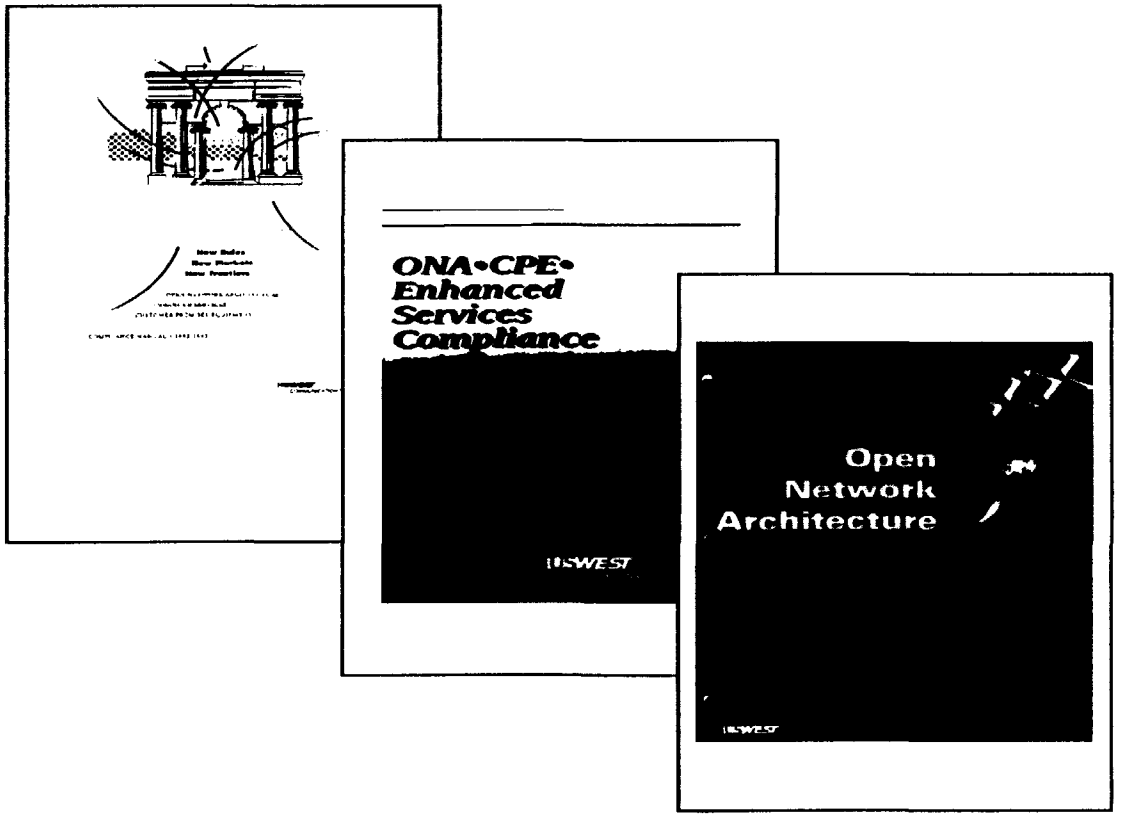
ONA Compliance at U S WEST



General Training

- Manuals
- Videos

Training Manuals



Targeted Training

- Manuals
- Videos
- Interactive Video

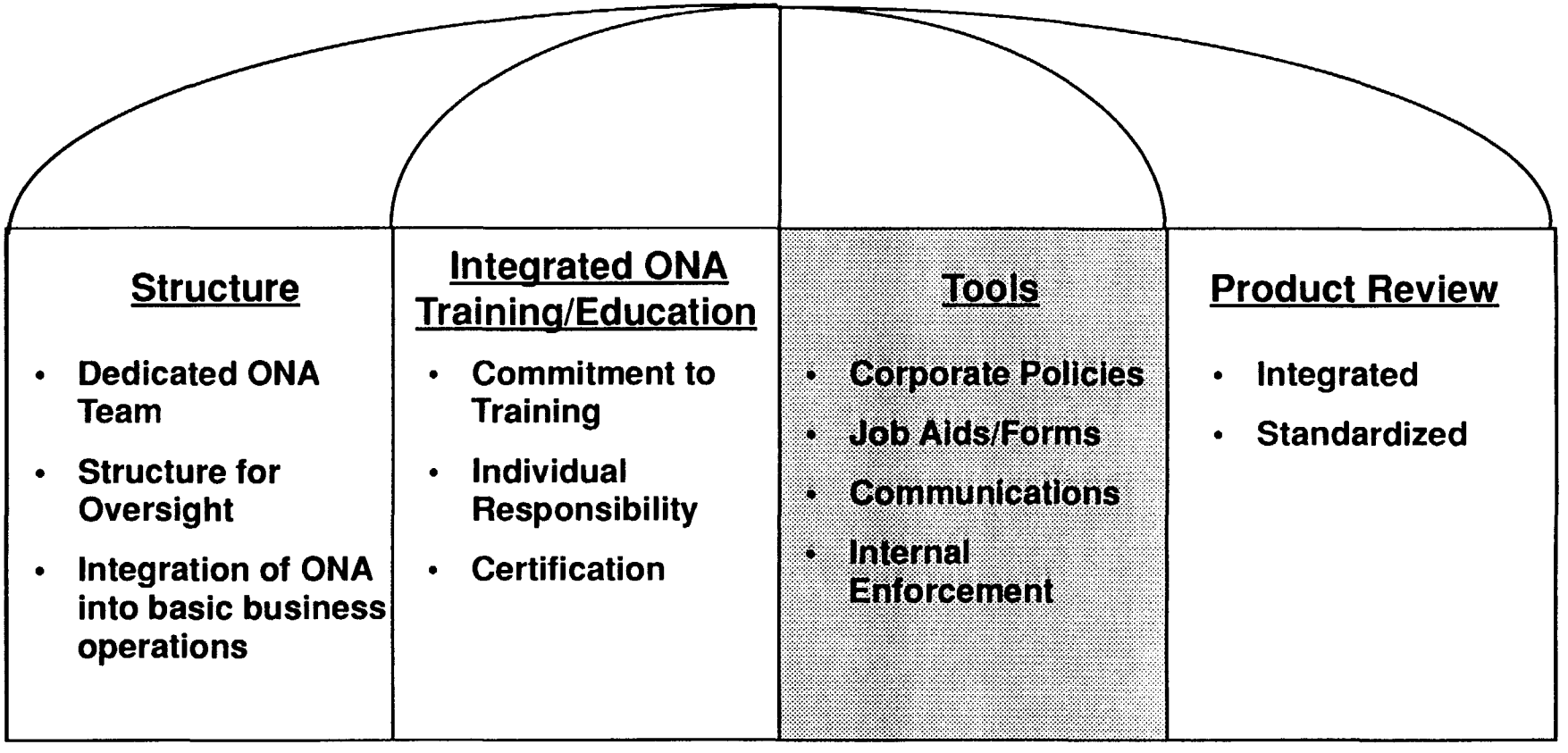
Compliance Manager Training

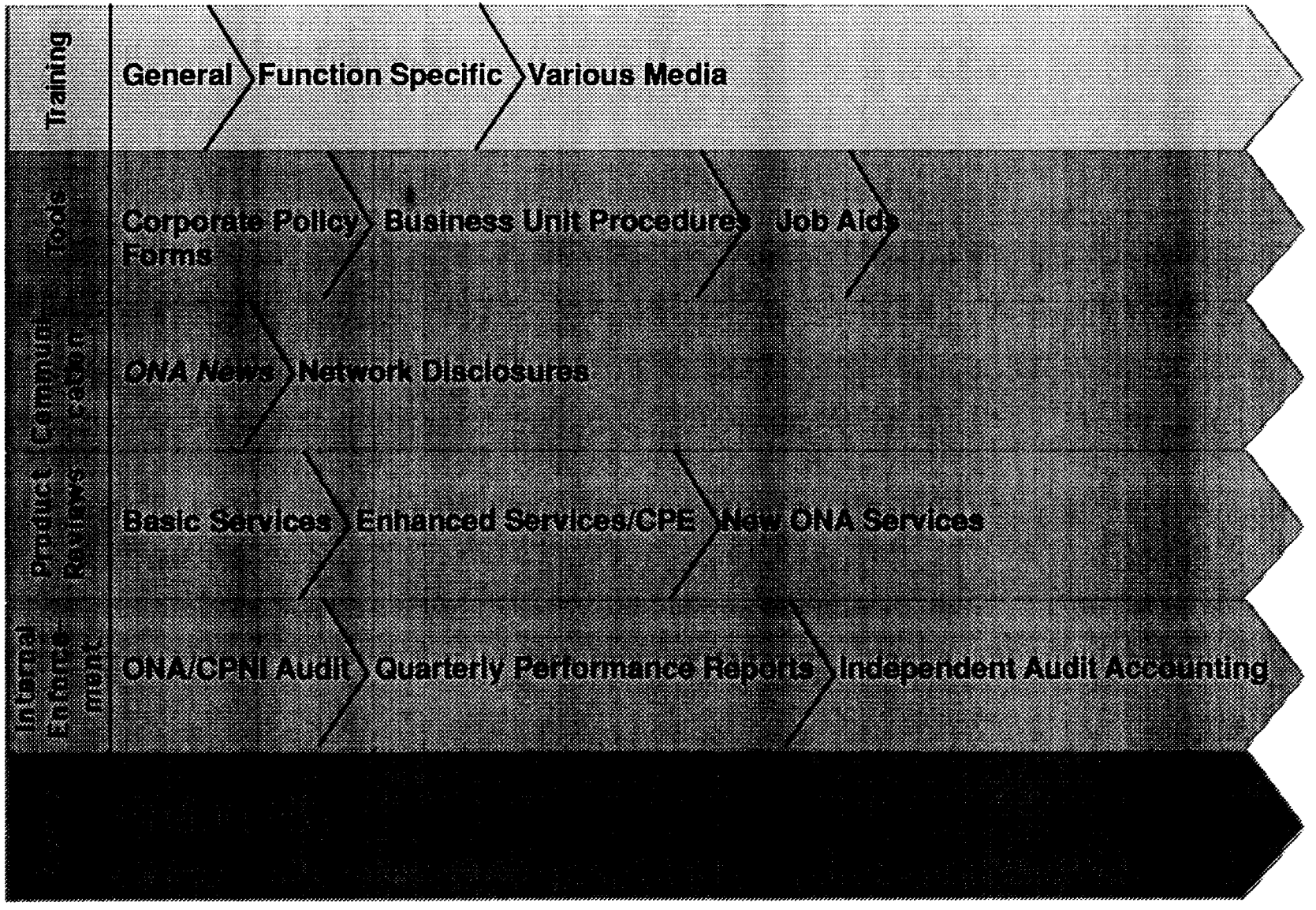
- Compliance Managers Conference
- "Training Series"
- Conference Calls

Employee Certification

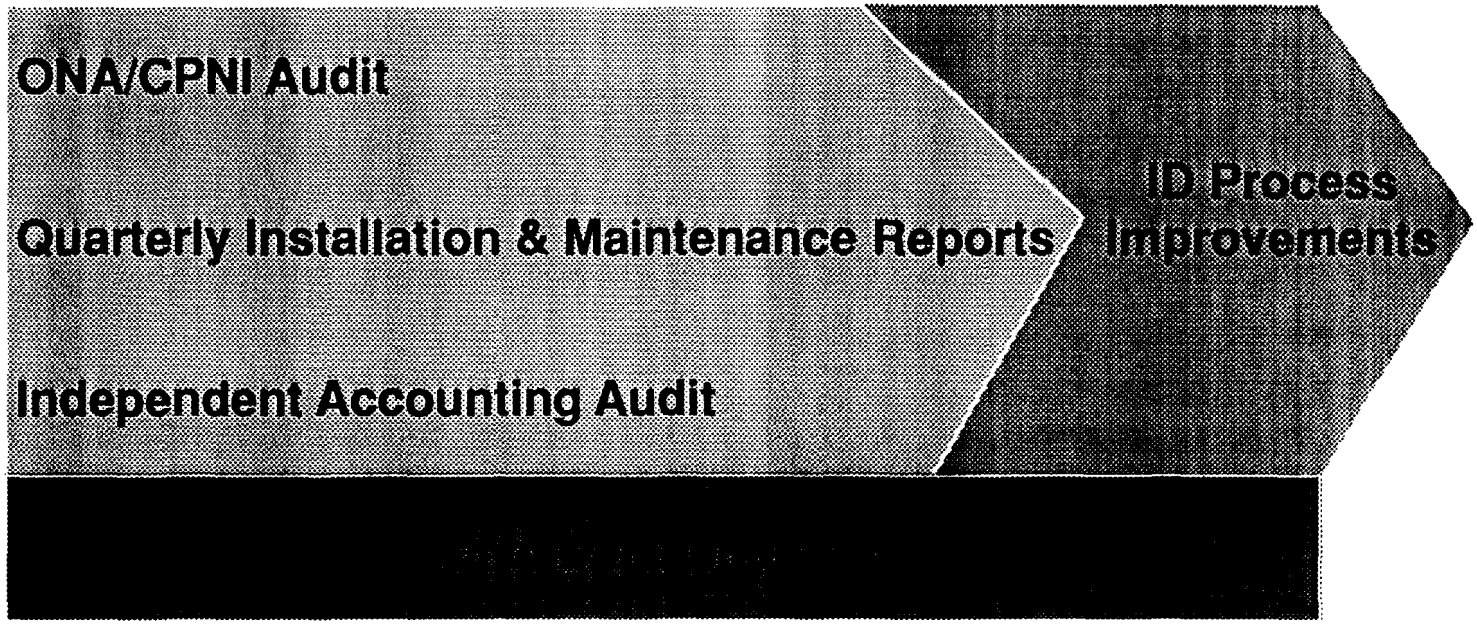
- Standard form assists tracking
- Provides record of employees who have received training
- Supervisor certifies affected non-management employees have received training

ONA Compliance at U S WEST



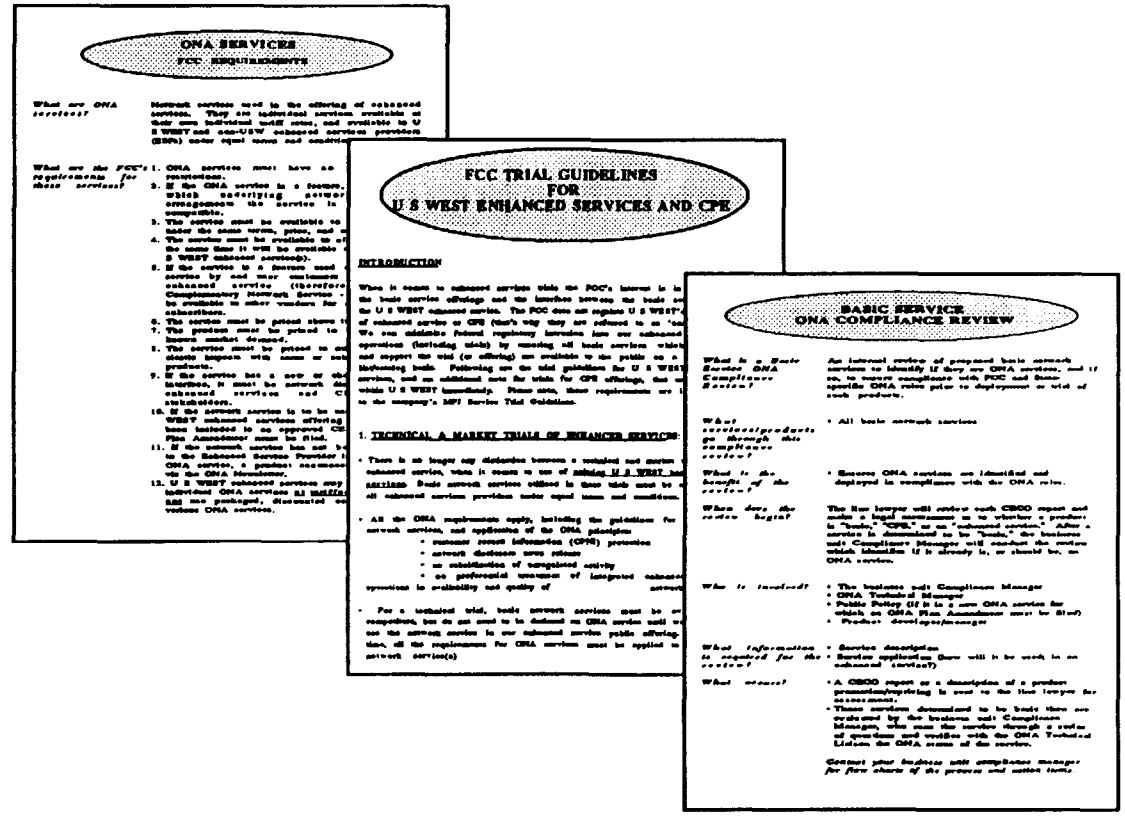

Training
General
Function Specific
Various Media
Product / Communication Tools
Reviews / Education
Internal Enforcement
Corporate Policy
Business Unit Procedures
Job Aids
Forms
ONA News
Network Disclosures
Basic Services
Enhanced Services/CPE
New ONA Services
ONA/CPNI Audit
Quarterly Performance Reports
Independent Audit Accounting
COMPLIANCE

Internal Enforcement



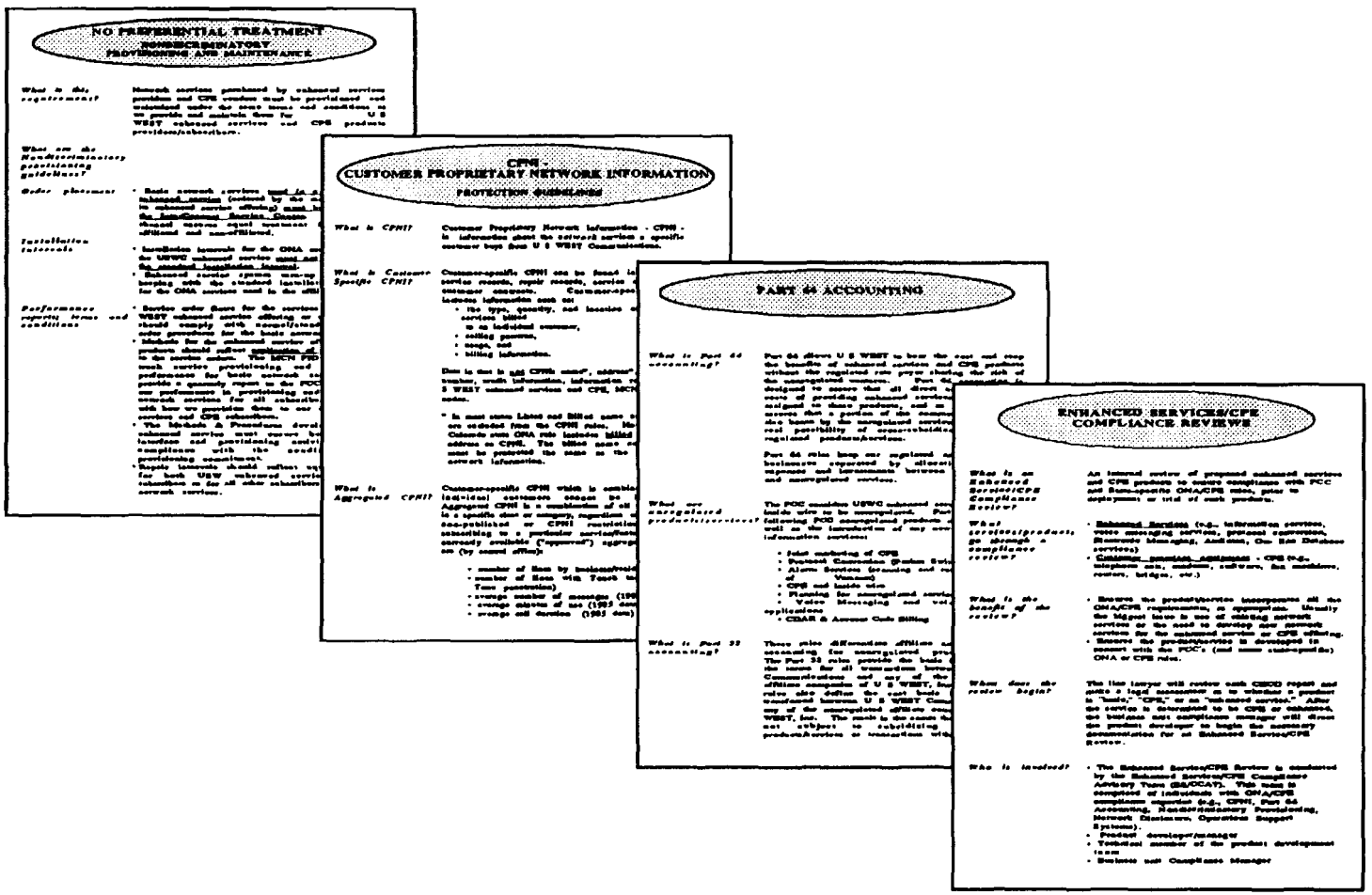
COMPLIANCE

ONA/CPE Job Aids



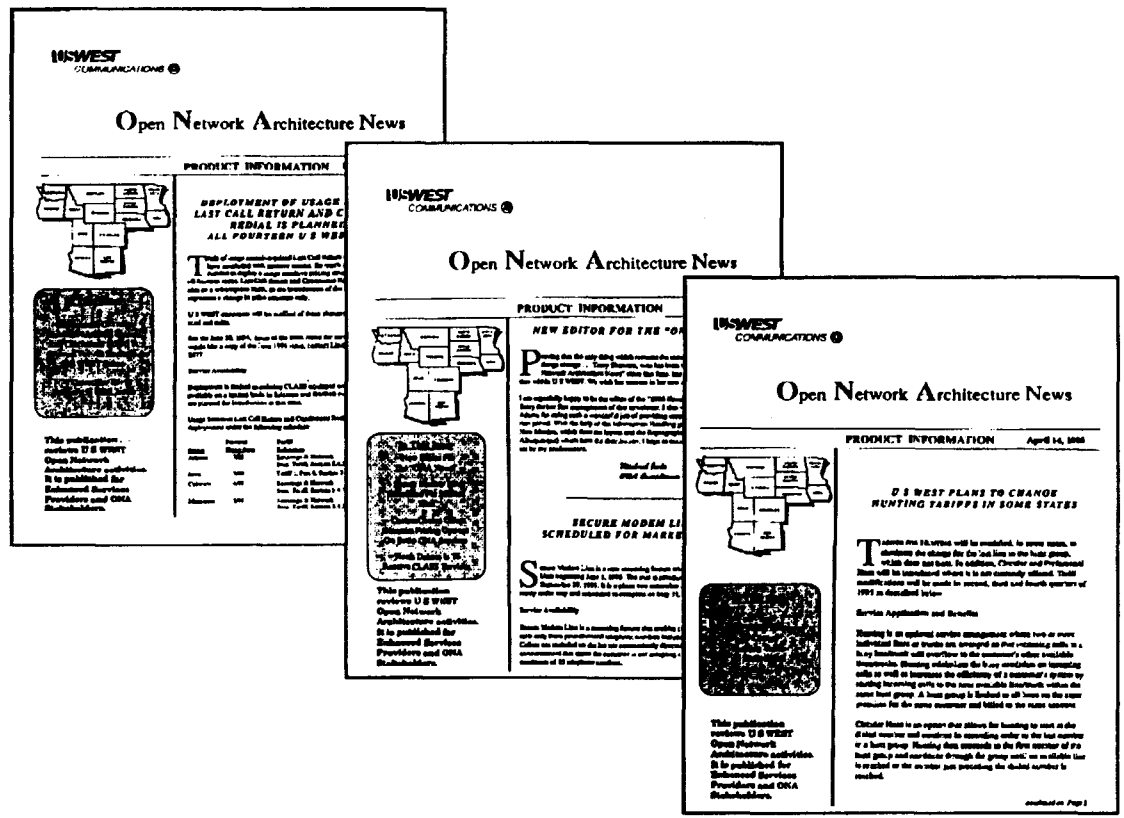
Basic Services

ONA/CPE Job Aids

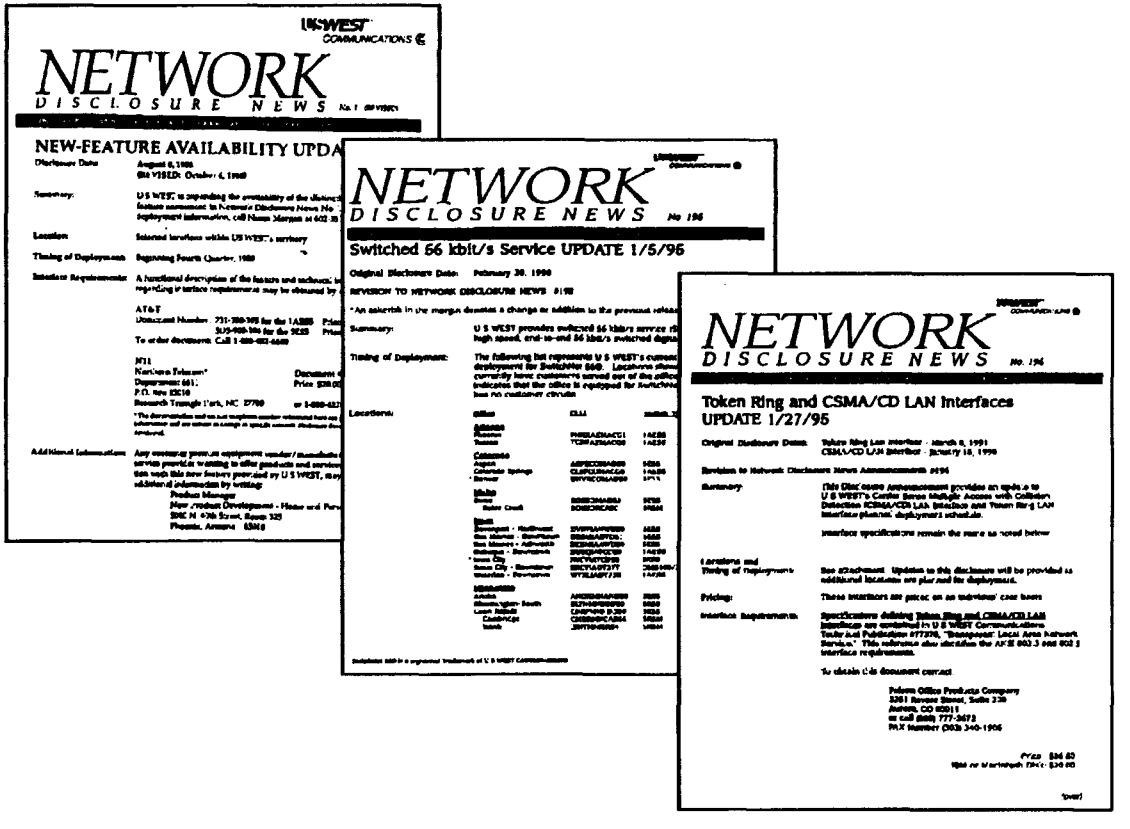


Enhanced Services

ONA Newsletters



Network Disclosures



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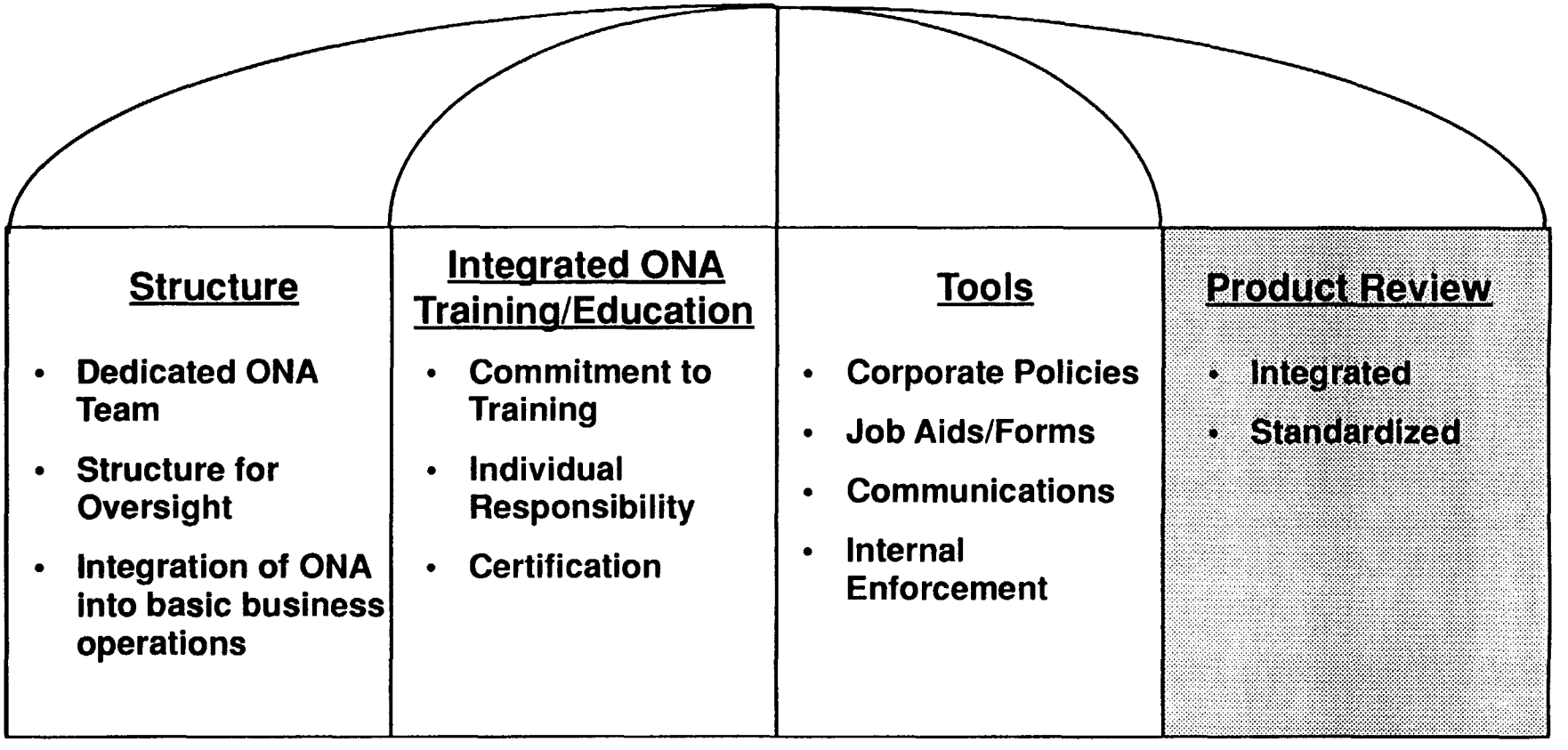
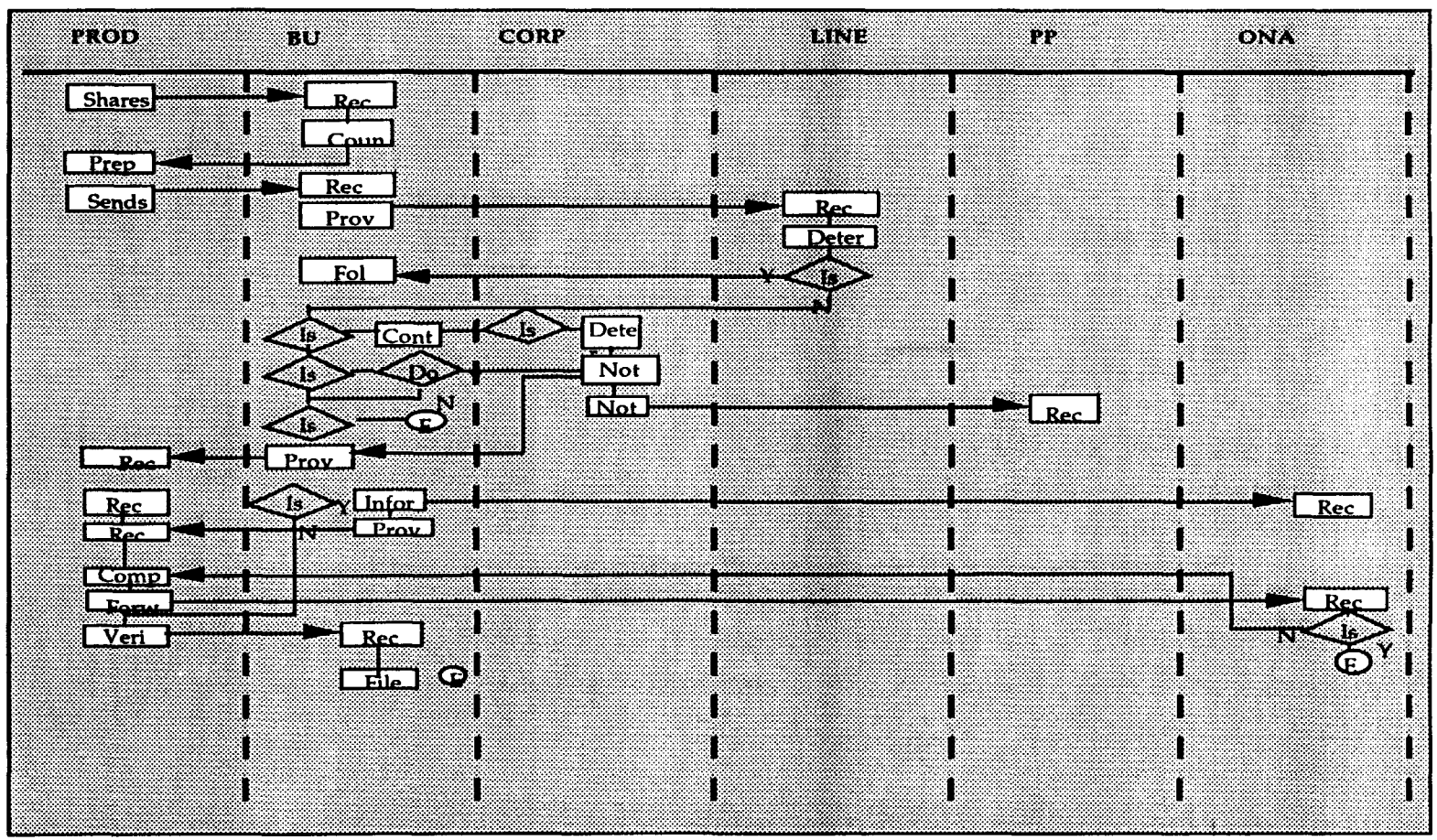
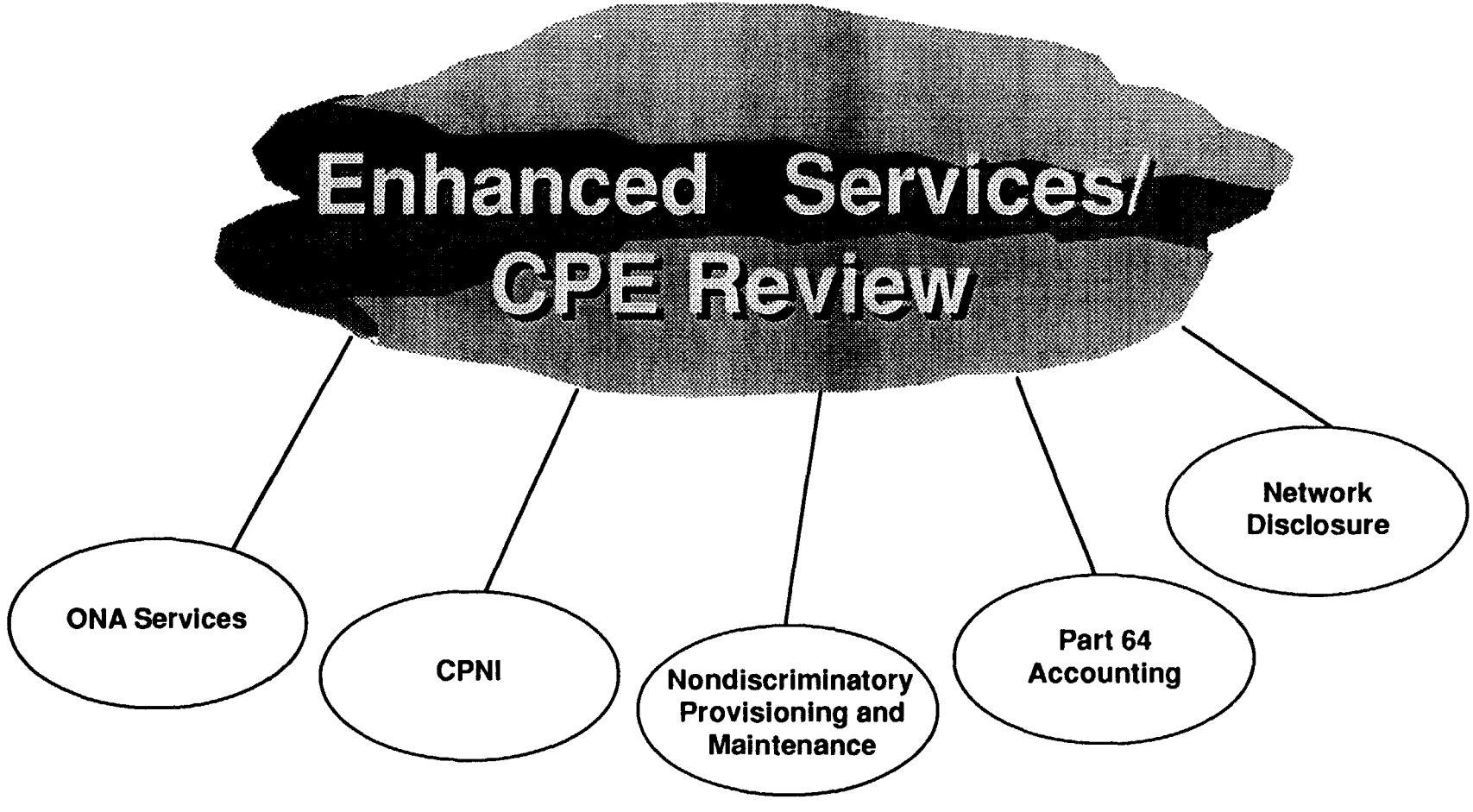


Product Reviews

	Basic Service ONA Review	Enhanced Services/CPE Compliance Review	"120-Day" Review
What	Network Services	U S WEST Enhanced Service/CPE Product Ideas	ESP and U S WEST enhanced service network capability request
Who	Business Unit Compliance Manager and ONA Subject Matter Experts	Enhanced Service/CPE Compliance Advisory Team	ONA Product Team
How	Formal Process (See flow chart and job aids)	- Formal Process (see flow chart and job aids) - Consistent Application of Safeguards	Formal Process (see job aids)
Output	ONA status of Network Services	Certification of Compliance	Status of request

Basic Service ONA Compliance Review Process



ES/CCAT Function Chart